

UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF NORTH CAROLINA  
WESTERN DIVISION

UNITED STATES OF AMERICA	)	
	)	
v.	)	<u>INDICTMENT</u>
	)	
LAWRENCE LEVON JONES	)	NO. <u>5:20-CR-388-1D(3)</u>
ROBERT CHRISTOPHER MCNEAL	)	NO. <u>5:20-CR-388-2D(3)</u>
TYRONE BRAGG	)	NO. <u>5:20-CR-388-3D(3)</u>
[REDACTED]	)	NO [REDACTED]
	)	NO [REDACTED]
	)	NO [REDACTED]
	)	NO [REDACTED]
HURLEY MATTHEW CANNADY	)	NO. <u>5:20-CR-388-8D(3)</u>
[REDACTED]	)	NO. [REDACTED]

The Grand Jury charges that:

COUNT ONE

Beginning no later than in or about August 2017, the exact date being unknown to the Grand Jury, and continuing up to and including on or about the date of this indictment, in the Eastern District of North Carolina, and elsewhere, LAWRENCE LEVON JONES, ROBERT CHRISTOPHER MCNEAL, TYRONE BRAGG, [REDACTED]

[REDACTED] HURLEY MATTHEW CANNADY, [REDACTED] defendants herein, did knowingly and intentionally combine, conspire, confederate, agree, and have a tacit understanding with each other and other persons, known and unknown to the Grand Jury, to knowingly and intentionally distribute and possess with the intent to distribute cocaine and cocaine base (crack), Schedule II controlled substances, and heroin,

marijuana, and methylenedioxymethamphetamine (MDMA), Schedule I controlled substances, in violation of Title 21, United States Code, Section 841(a)(1).

Quantity of Controlled Substances Involved in the Conspiracy

With respect to LAWRENCE LEVON JONES, the amounts involved in the conspiracy attributable to him as a result of his own conduct and the conduct of other conspirators reasonably foreseeable to him, are five (5) kilograms or more of cocaine, two hundred and eighty (280) grams or more of cocaine base (crack), Schedule II controlled substances, and one hundred (100) grams or more of heroin, one hundred (100) kilograms or more of marijuana, and a quantity of methylenedioxymethamphetamine (MDMA), Schedule I controlled substances, in violation of Title 21, United States Code, Sections 841(b)(1)(A) and (B) and (C).

With respect to ROBERT CHRISTOPHER MCNEAL, the amounts involved in the conspiracy attributable to him as a result of his own conduct and the conduct of other conspirators reasonably foreseeable to him, are five (5) kilograms or more of cocaine, two hundred and eighty (280) grams or more of cocaine base (crack), Schedule II controlled substances, and one hundred (100) grams or more of heroin, one hundred (100) kilograms or more of marijuana, and a quantity of methylenedioxymethamphetamine (MDMA), Schedule I controlled substances, in violation of Title 21, United States Code, Sections 841(b)(1)(A) and (B) and (C).

With respect to TYRONE BRAGG, the amounts involved in the conspiracy attributable to him as a result of his own conduct and the conduct of other conspirators reasonably foreseeable to him, are five (5) kilograms or more of cocaine,

two hundred and eighty (280) grams or more of cocaine base (crack), Schedule II controlled substances, and one hundred (100) kilograms or more of marijuana, and a quantity of methylenedioxymethamphetamine (MDMA), Schedule I controlled substances, in violation of Title 21, United States Code, Sections 841(b)(1)(A) and (B) and (C).

With respect to [REDACTED], the amounts involved in the conspiracy attributable to him as a result of his own conduct and the conduct of other conspirators reasonably foreseeable to him, are five (5) kilograms or more of cocaine, two hundred and eighty (280) grams or more of cocaine base (crack), Schedule II controlled substances, and one hundred (100) kilograms or more of marijuana, and a quantity of methylenedioxymethamphetamine (MDMA), Schedule I controlled substances, in violation of Title 21, United States Code, Sections 841(b)(1)(A) and (B) and (C).

With respect to [REDACTED], the amounts involved in the conspiracy attributable to him as a result of his own conduct and the conduct of other conspirators reasonably foreseeable to him, are five (5) kilograms or more of cocaine, two hundred and eighty (280) grams or more of cocaine base (crack), Schedule II controlled substances, and one hundred (100) kilograms or more of marijuana, and a quantity of methylenedioxymethamphetamine (MDMA), Schedule I controlled substances, in violation of Title 21, United States Code, Sections 841(b)(1)(A) and (B) and (C).

With respect to [REDACTED], the amounts involved in the conspiracy attributable to him as a result of his own conduct and the conduct of other conspirators reasonably foreseeable to him, are a quantity of cocaine, a Schedule II controlled substance, and a quantity of marijuana, Schedule I controlled substance, in violation of Title 21, United States Code, Section 841(b)(1)(C).

With respect to [REDACTED], the amounts involved in the conspiracy attributable to him as a result of his own conduct and the conduct of other conspirators reasonably foreseeable to him, are a quantity of cocaine, twenty eight (28) grams or more of cocaine base (crack), Schedule II controlled substances, and one hundred (100) grams or more of heroin, a quantity of marijuana, Schedule I controlled substances, in violation of Title 21, United States Code, Sections 841(b)(1)(B) and (C).

With respect to HURLEY MATTHEW CANNADY, the amounts involved in the conspiracy attributable to him as a result of his own conduct and the conduct of other conspirators reasonably foreseeable to him, are a quantity of cocaine, a Schedule II controlled substance, in violation of Title 21, United States Code, Section 841(b)(1)(C).

With respect to [REDACTED], the amounts involved in the conspiracy attributable to him as a result of his own conduct and the conduct of other conspirators reasonably foreseeable to him, are five hundred (500) grams or more of cocaine, a quantity of cocaine base (crack), Schedule II controlled substances, in violation of Title 21, United States Code, Sections 841(b)(1)(B) and (C).

All in violation of Title 21, United States Code, Section 846.

COUNT TWO

On or about July 2, 2019, in the Eastern District of North Carolina, the defendants, ROBERT CHRISTOPHER MCNEAL and [REDACTED] aiding and abetting each other, did knowingly and intentionally distribute a quantity of cocaine, a Schedule II controlled substance, in violation of Title 21, United States Code, Section 841(a)(1) and Title 18, United States Code, Section 2.

COUNT THREE

On or about July 14, 2019, in the Eastern District of North Carolina, the defendant, ROBERT CHRISTOPHER MCNEAL, did knowingly and intentionally distribute a quantity of cocaine, a Schedule II controlled substance, in violation of Title 21, United States Code, Section 841(a)(1).

COUNT FOUR

On or about August 18, 2019, in the Eastern District of North Carolina, the defendant, ROBERT CHRISTOPHER MCNEAL, did knowingly and intentionally distribute a twenty eight (28) grams or more of cocaine base (crack), a Schedule II controlled substance, in violation of Title 21, United States Code, Section 841(a)(1).

COUNT FIVE

On or about October 3, 2019, in the Eastern District of North Carolina, the defendant, [REDACTED] did knowingly and intentionally distribute a quantity of cocaine base (crack), a Schedule II controlled substance, in violation of Title 21, United States Code, Section 841(a)(1).

COUNT SIX

On or about October 9, 2019, in the Eastern District of North Carolina, the defendants, ROBERT CHRISTOPHER MCNEAL and [REDACTED] aiding and abetting each other, did knowingly and intentionally distribute a quantity of cocaine base (crack), a Schedule II controlled substance, in violation of Title 21, United States Code, Section 841(a)(1) and Title 18, United States Code, Section 2.

COUNT SEVEN

On or about October 31, 2019, in the Eastern District of North Carolina, the defendants, ROBERT CHRISTOPHER MCNEAL, did knowingly and intentionally distribute a quantity of cocaine, a Schedule II controlled substance, in violation of Title 21, United States Code, Section 841(a)(1).

COUNT EIGHT

On or about January 2, 2020, in the Eastern District of North Carolina, the defendant, ROBERT CHRISTOPHER MCNEAL, did knowingly and intentionally distribute a quantity of cocaine, a Schedule II controlled substance, in violation of Title 21, United States Code, Section 841(a)(1).

COUNT NINE

Beginning no later than on or about November 2019 and continuing until in or about July 22, 2020, in the Eastern District of North Carolina, the defendants, LAWRENCE JONES and TYRONE BRAGG, aiding and abetting one another, did knowingly and intentionally maintain a place at 7 Swain Street, Raleigh, North Carolina, for the purpose of manufacturing, distributing, and using cocaine and

cocaine base (crack), Schedule II controlled substances, and methylenedioxymethamphetamine (MDMA) and marijuana, Schedule I controlled substances, in violation of Title 21, United States Code, Section 856(a)(1) and Title 18, United States Code, Section 2.

COUNT TEN

Beginning no later than on or about March 2020 and continuing until on or about July 22, 2020, in the Eastern District of North Carolina, the defendant, ROBERT CHRISTOPHER MCNEAL, did knowingly and intentionally maintain a place at 7770-207 Midtown Market Avenue, Raleigh, North Carolina, for the purpose of manufacturing, distributing, and using cocaine and cocaine base (crack), Schedule II controlled substances, and heroin and marijuana, Schedule I controlled substances, in violation of Title 21, United States Code, Section 856(a)(1).

COUNT ELEVEN

Beginning no later than on or about March 2020 and continuing until on or about July 22, 2020, in the Eastern District of North Carolina, the defendants, ROBERT CHRISTOPHER MCNEAL and [REDACTED], aiding and abetting one another, did knowingly and intentionally maintain a place at 5913 Rivercliff Court, Raleigh, North Carolina, for the purpose of manufacturing, distributing, and using cocaine, a Schedule II controlled substance, and marijuana, a Schedule I controlled substance, in violation of Title 21, United States Code, Section 856(a)(1) and Title 18, United States Code, Section 2.

COUNT TWELVE

On or about July 8, 2020, in the Eastern District of North Carolina, the defendant, HURLEY MATTHEW CANNADY, did knowingly and intentionally possess with intent to distribute a quantity of cocaine, a Schedule II controlled substance, in violation of Title 21, United States Code, Section 841(a)(1).

COUNT THIRTEEN

On or about July 8, 2020, in the Eastern District of North Carolina, the defendant, HURLEY MATTHEW CANNADY, did knowingly possess a firearm, in furtherance of a drug trafficking crime, for which he may be prosecuted in a court of the United States as charged in Count Twelve of this Indictment, in violation of Title 18, United States Code, Section 924(c)(1)(A).

COUNT FOURTEEN

On or about July 8, 2020, in the Eastern District of North Carolina, the defendant, HURLEY MATTHEW CANNADY, knowing he had been previously convicted of a crime punishable by imprisonment for a term exceeding one (1) year, knowingly possessed a firearm and the firearm was in and affecting commerce, in violation of Title 18, United States Code, Sections 922(g)(1) and 924.

COUNT FIFTEEN

On or about July 10, 2020, in the Eastern District of North Carolina, the defendant, [REDACTED] did knowingly and intentionally possess with intent to distribute twenty eight (28) grams or more of cocaine base (crack), a Schedule II controlled substance, and a quantity of heroin and a quantity of

marijuana, Schedule I controlled substances, in violation of Title 21, United States Code, Section 841(a)(1).

COUNT SIXTEEN

On or about July 10, 2020, in the Eastern District of North Carolina, the defendant, [REDACTED] did knowingly possess a firearm, in furtherance of a drug trafficking crime, for which he may be prosecuted in a court of the United States as charged in Count Fifteen of this Indictment, in violation of Title 18, United States Code, Section 924(c)(1)(A).

COUNT SEVENTEEN

On or about July 22, 2020, in the Eastern District of North Carolina, the defendants, LAWRENCE LEVON JONES, ROBERT CHRISTOPHER MCNEAL, and TYRONE BRAGG, aiding and abetting one another, did knowingly and intentionally possess with intent to distribute five hundred (500) grams or more of cocaine, two hundred and eighty (280) grams or more of cocaine base (crack), Schedule II controlled substances, a quantity of marijuana, and a quantity of methylenedioxymethamphetamine (MDMA), Schedule I controlled substances, in violation of Title 21, United States Code, Section 841(a)(1) and Title 18, United States Code, Section 2.

COUNT EIGHTEEN

On or about July 22, 2020, in the Eastern District of North Carolina, the defendant, LAWRENCE LEVON JONES, ROBERT CHRISTOPHER MCNEAL, and TYRONE BRAGG, aiding and abetting one another, did knowingly possess a firearm,

in furtherance of a drug trafficking crime, for which he may be prosecuted in a court of the United States as charged in Counts Nine through Eleven and Count Seventeen of this Indictment, in violation of Title 18, United States Code, Sections 924(c)(1)(A) and 2.

COUNT NINETEEN

On or about July 22, 2020, in the Eastern District of North Carolina, the defendants, LAWRENCE LEVON JONES, ROBERT CHRISTOPHER MCNEAL, and TYRONE BRAGG, aiding and abetting one another, knowing each had been previously convicted of a crime punishable by imprisonment for a term exceeding one (1) year, knowingly possessed a firearm and the firearm was in and affecting commerce, in violation of Title 18, United States Code, Sections 922(g)(1), 924 and 2.

COUNT TWENTY

On or about July 22, 2020, in the Eastern District of North Carolina, the defendant, [REDACTED], did knowingly and intentionally possess with intent to distribute a quantity of cocaine, a Schedule II controlled substance, and a quantity of marijuana, a Schedule I controlled substance, in violation of Title 21, United States Code, Section 841(a)(1).

COUNT TWENTY ONE

On or about July 22, 2020, in the Eastern District of North Carolina, the defendant, [REDACTED], did knowingly possess a firearm, in furtherance of a drug trafficking crime, for which he may be prosecuted in a court of

the United States as charged in Counts Eleven and Twenty of this Indictment, in violation of Title 18, United States Code, Section 924(c)(1)(A).

COUNT TWENTY TWO

On or about July 22, 2020, in the Eastern District of North Carolina, the defendant, [REDACTED], knowing he had been previously convicted of a crime punishable by imprisonment for a term exceeding one (1) year, knowingly possessed a firearm and the firearm was in and affecting commerce, in violation of Title 18, United States Code, Sections 922(g)(1) and 924.

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**FORFEITURE NOTICE**

Notice is hereby given that all right, title and interest in the property described herein is subject to forfeiture.

Upon conviction of any felony violation of the Controlled Substances Act charged herein, the defendant shall forfeit to the United States, pursuant to 21 U.S.C. § 853(a), any property constituting, or derived from, any proceeds obtained, directly or indirectly, as a result of the said offense, and any property used, or intended to be used, in any manner or part, to commit, or to facilitate the commission of the said offense.

Upon conviction of any violation of the Gun Control Act, the National Firearms Act, or any other offense charged herein that involved or was perpetrated in whole or in part by the use of firearms or ammunition, the defendant shall forfeit to the United States, pursuant to 18 U.S.C. § 924(d) and/or 26 U.S.C. § 5872, as made applicable by 28 U.S.C. § 2461(c), any and all firearms and ammunition that were involved in or used in a knowing or willful commission of the offense, or, pursuant to 18 U.S.C. § 3665, that were found in the possession or under the immediate control of the defendant at the time of arrest.

The forfeitable property includes, but is not limited to, the following:

**Personal Property:**

- a) Approximately \$1,007 in United States Currency seized on July 8, 2020  
from HURLEY MATTHEW CANNADY
- b) One Glock 19 9mm semi-automatic handgun, bearing serial number

BCCL000, seized on July 8, 2020 from HURLEY MATTHEW CANNADY and any and all associated ammunition.

- c) Approximately \$1,306 in United States Currency seized on July 10, 2020 from [REDACTED]
- d) Any and all associated ammunition seized on July 10, 2020 from [REDACTED]  
[REDACTED]
- e) Approximately \$856 in United States Currency seized on July 22, 2020 from ROBERT CHRISTOPHER MCNEAL
- f) Approximately \$691 in United States Currency seized on July 22, 2020 from LAWRENCE LEVON JONES
- g) Approximately \$99,300 in United States Currency seized on July 22, 2020 from 7 North Swain Street, Raleigh, North Carolina
- h) The following firearms and any and all associated ammunition seized on July 22, 2020 from 7 North Swain Street, North Carolina
  - a. Smith & Wesson M&P 40 caliber handgun, bearing serial number DVD5597
  - b. Beretta 9mm 92FS handgun, bearing serial number K627247
- i) Approximately \$9,077 in United States Currency seized on July 22, 2020 from 7770-207 Midtown Market Avenue, Raleigh, North Carolina
- j) Approximately \$3,436 in United States Currency seized on July 22, 2020 from 5913 Rivercliff Court, Raleigh, North Carolina
- k) The following firearms and any and all associated ammunition seized on July 22, 2020 from 5913 Rivercliff Court, North Carolina

- a. Ruger LCP II .380 handgun, bearing serial number 380309150
  - b. Taurus G2C 9mm handgun, bearing serial number TLS38374
  - c. Beretta 92F Mod 9mm handgun, bearing serial number C751687
  - d. Remington 1100 12 gauge shotgun, bearing serial number DU11847
  - e. Western Field M150B 410 gauge shotgun, bearing serial number 719490
  - f. Revelation R310AB 12 gauge shotgun, bearing serial number G059689
  - g. Marlin Model 60 .22 caliber rifle, bearing serial number 17446265
  - h. Iver Johnson Model 55A revolver, bearing serial number H75292
  - i. Spikes Tactical ST15 .556 caliber rifle, bearing serial number SBR15656
- l) Approximately \$15,696 in United States Currency seized on July 22, 2020  
from [REDACTED] in  
Mitchell County, Texas
- m) Approximately \$569,061 in United States Currency seized on July 22, 2020  
from 8601 Lincoln Boulevard, Apartment 2-308, Los Angeles, California
- n) Ruger .38 revolver, bearing serial number 542-96424, seized on July 22,  
2020 from 8601 Lincoln Boulevard, Apartment 2-308, Los Angeles,  
California and any and all associated ammunition.
- o) Approximately \$35,260 in United States Currency seized on July 24, 2020  
from 1521 Ujamaa Drive, Raleigh, North Carolina
- p) Miscellaneous items of jewelry seized on July 24, 2020 from 1521 Ujamaa  
Drive, Raleigh, North Carolina
- q) Approximately \$47,983 in United States Currency seized on July 24, 2020  
from Katrina Langford
- r) Approximately \$150,140 in United States Currency seized on July 24, 2020  
from 2315 Oak Ridge Boulevard, Durham, North Carolina

s) The following firearms and any and all associated ammunition seized on August 5, 2020 from 1052 Laurel Ridge Road, McDonough, Georgia

- a. Rock River Arms LAR 15 5.56 rifle, bearing serial number CM156477
- b. Taurus Brasil .38 Special revolver, bearing serial number KF45564

t) One 2013 International 8000 Series dump truck, VIN: 1HSHXSJR5DJ138339, titled to Key Management & Trucking Services, LLC

If any of the above-described forfeitable property, as a result of any act or omission of a defendant: cannot be located upon the exercise of due diligence; has been transferred or sold to, or deposited with, a third party; has been placed beyond the jurisdiction of the court; has been substantially diminished in value; or has been commingled with other property which cannot be divided without difficulty; it is the intent of the United States, pursuant to Title 21, United States Code, Section 853(p), to seek forfeiture of any other property of said defendant up to the value of the forfeitable property described above.

A TRUE BILL:

**REDACTED VERSION**

Pursuant to the E-Government Act and the federal rules, the unredacted version of this document has been filed under seal.

**FOREPERSON**

DATE: August 19, 2020

ROBERT J. HIGDON, Jr.  
United States Attorney

BY: THOMAS L. CROSBY  
Assistant United States Attorney  
Criminal Division